Fact Sheet Edits

Class V 00527	Ex. 6 Personal Privacy (PP)	Clean Water Alliance	The EPA also omits information in its discussion of seismic factors in the Class V Fact Sheet. It states that it is "not aware" of a seismic event causing an injection well to contaminate a USDW or of studies done to determine whether such contamination has occurred (p. 54). It then lists states that have been studied on this issue. The list omits states with injection wells that have been linked – at least in the media -- to seismic incidents, including Oklahoma, North Dakota, and Pennsylvania. The EPA may be "not aware" of some of the research, but it should be held to a higher standard and required to do the relevant research before omitting important information. We also searched the Class V Fact Sheet looking for a thorough discussion of the seismic characteristics of the proposed mining and injection area. The presence of faults in the immediate area is mentioned (pp. 22-23), but their potential impacts are never analyzed. Similarly in the Class III Fact Sheet, the mechanisms by which Fall River formation water comes up through the Dewey fault is never analyzed (p. 45).
Class III Ex. 5 Deliberative Process (DP) 07460 (5/8 Rapid City hearing)	Ex. 6 Personal Privacy (PP)	Individual	The proposed well fields are located approximately 2 miles southeast of a large fault named the Dewey Fault. So far this fault is known to extend approximately 16 miles east and 4 miles west of the proposed ISL mine site. The consequences of an excursion of contaminated groundwater along a fault impacted my community when two containers of ethylene dibromide, a pesticide used to control the mountain pine beetle, was reportedly disposed of near the U.S. Forest Service Nemo Work Center in the mid 1970s. Plumes of groundwater contaminated with this probable human carcinogen continued to follow a fault that communicates with Box Elder Creek, upstream from a well-documented karst formation in the Madison limestone, and down into the Madison aquifer below Rapid City. Costs for water transport and water treatment were considered to be too high when the EDB was discovered in regional domestic wells in 1997, and so for the past 19 years, the community has depended upon one remote community well and two domestic wells for its entire water supply. If such an excursion were to enter the Dewey Fault, the scale of the problem could be staggering. I believe that Azarga/Powertech is overconfident in stating they will simply pump back excursions of lixiviant that occur.
	Ex. 6 Personal Privacy (PP)	Individual	Another concern is the in-situ mining process itself which uses a lixivient solution to release and suspend uranium in solution but also does the same for a number of other toxic heavy metals including arsenic, vanadium, selenium, et.al that are withdrawn with the uranium and wind up

Ex. 5 Deliberative Process (DP) 00500, 00501			being precipitated out in the settlement pond or sprayed onto fields or sent to a class V deep well. [...] The radioactive remains like thorium, radium and presumably non-radioactive elements like lead, arsenic and selenium, products of the RO process that weren't disposed of by spraying on the land or placed in a deep disposal well are sent to White Mesa even though they are trying to detoxify that site as well. Another issue is water consumption where the water is poisoned beyond any future use, although according to EPA report that might be kept to a minimum in the mining process by stripping the lixiviant by RO and reinjecting most of that water back into the Inyan Kara aquifer to repeat the cycle. The restoration phase might be another matter though where multiple pore volumes are required to bring concentrations of these toxic elements even close to baseline levels which has never occurred in any ISR mining operation.